\square

FORM 4

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

Check this box if no longer subject to
Section 16. Form 4 or Form 5
obligations may continue. See
Instruction 1(b).

STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934

OMB APPROVAL OMB Number: 3235-0287

Estimated average burden	
hours per response:	0.5

			or Section 30(n) of the investment company Act of 1940						
	ss of Reporting Persor TURNER DON		2. Issuer Name and Ticker or Trading Symbol <u>WILLIS GROUP HOLDINGS LTD</u> [WSH]		5. Relationship of Reporting Person(s) to Issuer (Check all applicable) Director 10% Owner				
(Last) C/O WILLIS GI TEN TRINITY	(First) ROUP HOLDINGS SOUARE	(Middle) S LIMITED	3. Date of Earliest Transaction (Month/Day/Year) 11/05/2007	X	Officer (give title below) CEO, Global M	Other (specify below) Iarkets			
(Street) LONDON (City)	X0 (State)	EC3P 3AX (Zip)	4. If Amendment, Date of Original Filed (Month/Day/Year)	6. Indiv Line) X	idual or Joint/Group Filing Form filed by One Repc Form filed by More than Person	orting Person			

Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned

ſ	1. Title of Security (Instr. 3)	2. Transaction Date (Month/Day/Year) 2A. Deemed Execution Date if any (Month/Day/Year)		cution Date, Transaction Date, Code (Instr. 5			4. Securities Acquired (A) or Disposed Of (D) (Instr. 3, 4 and 5)			6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)	7. Nature of Indirect Beneficial Ownership
				Code	v	Amount	(A) or (D)	Price	 Reported Transaction(s) (Instr. 3 and 4) 		(Instr. 4)

Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)

								2			-				
1. Title of Derivative Security (Instr. 3)	2. Conversion or Exercise Price of Derivative Security	3. Transaction Date (Month/Day/Year)	3A. Deemed Execution Date, if any (Month/Day/Year)	4. Transa Code (8)		of		6. Date Exercisable and Expiration Date (Month/Day/Year)		7. Title and Amount of Securities Underlying Derivative Security (Instr. 3 and 4)		8. Price of Derivative Security (Instr. 5)	9. Number of derivative Securities Beneficially Owned Following Reported Transaction(s) (Instr. 4)	10. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)	11. Nature of Indirect Beneficial Ownership (Instr. 4)
				Code	v	(A)	(D)	Date Exercisable	Expiration Date	Title	Amount or Number of Shares				
COMMON STOCK	\$39.96	11/05/2007 ⁽¹⁾		A		50,000		11/05/2009	11/05/2017	Common	50,000	\$39.96	105,000	Ι	Right to buy

Explanation of Responses:

1. Option granted over 50,000 shares at an exercise price of \$39.96. Options become exercisable in equal tranches on the second to fifth anniversaries of grant and lapse on the eighth anniversary of grant

/s/ Michael P. Chitty as
attorney-in-fact for Dominic
Samengo-Turner

11/07/2007

** Signature of Reporting Person

Date

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

 * If the form is filed by more than one reporting person, see Instruction 4 (b)(v).

** Intentional misstatements or omissions of facts constitute Federal Criminal Violations See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB Number.