

INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

OMB APPROVAL

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Estimated average burden

hours per response: 0.5

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934
or Section 30(h) of the Investment Company Act of 1940

1. Name and Address of Reporting Person* <u>LONDON CHRISTOPHER M</u> (Last) (First) (Middle) <u>C/O WILLIS GROUP HOLDINGS LIMITED</u> <u>TEN TRINITY SQUARE</u> (Street) <u>LONDON ENGLAND</u> <u>EC3P 3AX</u> (City) (State) (Zip)	2. Date of Event Requiring Statement (Month/Day/Year) <u>11/19/2003</u>	3. Issuer Name and Ticker or Trading Symbol <u>WILLIS GROUP HOLDINGS LTD [WSH]</u>	
		4. Relationship of Reporting Person(s) to Issuer (Check all applicable) Director 10% Owner <input checked="" type="checkbox"/> Officer (give title below) Other (specify below) <u>COO - Global Specialties</u>	5. If Amendment, Date of Original Filed (Month/Day/Year) 6. Individual or Joint/Group Filing (Check Applicable Line) <input checked="" type="checkbox"/> Form filed by One Reporting Person Form filed by More than One Reporting Person

Table I - Non-Derivative Securities Beneficially Owned

1. Title of Security (Instr. 4)	2. Amount of Securities Beneficially Owned (Instr. 4)	3. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	4. Nature of Indirect Beneficial Ownership (Instr. 5)
Common Stock	125,870	D	

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

1. Title of Derivative Security (Instr. 4)	2. Date Exercisable and Expiration Date (Month/Day/Year)		3. Title and Amount of Securities Underlying Derivative Security (Instr. 4)	4. Conversion or Exercise Price of Derivative Security	5. Ownership Form: Direct (D) or Indirect (I) (Instr. 5)	6. Nature of Indirect Beneficial Ownership (Instr. 5)	
	Date Exercisable	Expiration Date					Title
Common Stock	12/18/2001	12/18/2008	Common Stock	45,000	3.31 ⁽¹⁾	I	Right to Buy
Common Stock	12/18/2002	12/18/2008	Common Stock	45,000	3.31 ⁽¹⁾	I	Right to Buy
Common Stock	12/18/2003	12/18/2008	Common Stock	45,000	3.31 ⁽¹⁾	I	Right to Buy
Common Stock	12/18/2004	12/18/2008	Common Stock	45,000	3.31 ⁽¹⁾	I	Right to Buy
Common Stock	08/01/2004	01/31/2005	Common Stock	393	13.5 ⁽²⁾	I	Right to Buy
Common Stock	07/01/2005	12/31/2005	Common Stock	197	28.2 ⁽³⁾	I	Right to Buy
Common Stock	07/01/2006	12/31/2006	Common Stock	98	30.7 ⁽³⁾	I	Right to Buy
Common Stock	03/24/2001	12/18/2008	Common Stock	4,130	1.65 ⁽⁴⁾	I	Right to Buy
Common Stock	02/27/2005	08/27/2005	Common Stock	1,821	26.84 ⁽⁵⁾	I	Right to Buy

Explanation of Responses:

- The option exercise price was GBP 2.00 being the sterling equivalent at the date of grant.
- The option exercise price was GBP 9.85 being the sterling equivalent at the date of grant.
- The option exercise price was GBP 19.26 being the sterling equivalent at the date of grant.
- The option exercise price was GBP 1.00 total being the sterling equivalent at the date of grant
- The option exercise price was GBP 18.87 being the sterling equivalent at the date of grant

CHRISTOPHER M. LONDON 11/19/2003

** 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 5 (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.